

GIBSON DUNN

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March 26, 2019

VIA ECF & REGULAR MAIL

Hon. Joseph A. Dickson, U.S.M.J.
Martin Luther King Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *In re Mercedes-Benz Emissions Litigation*, Case No. 16-cv-881 (JLL)(JAD)

Dear Judge Dickson:

This firm, together with co-counsel at Squire Patton Boggs (US) LLP, represents Defendants Daimler AG and Mercedes-Benz USA, LLC in the above-captioned action. As the Court is aware, Plaintiffs and Defendants recently filed letters regarding the potential appointment of a Special Master in this case, and Your Honor held a hearing on this issue on March 18, 2019.

We write jointly with Plaintiffs, Defendant Robert Bosch LLC, and the United States of America to respectfully request that the parties have until April 10, 2019 to move to seal any confidential information in these letters or the hearing transcript, and to file redacted versions of the letters, as appropriate. The April 10 deadline is needed to allow the parties to fully analyze the materials and confer regarding the scope of confidential information contained therein, if any. Until the Court rules on the forthcoming motion to seal, we respectfully request that D.E. 165, 167, 170, 180-82, and 188 be kept under seal.

If this request meets the Court's approval, we ask that Your Honor "So Order" this letter and place it on the docket. We appreciate the Court's consideration of this request and ongoing attention to this matter. We are available if the Court has any questions or concerns.

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Respectfully submitted,

/s/ Lucas C. Townsend

cc: All Counsel of Record

SO ORDERED this ____ day of _____, 2019

HON. JOSEPH A. DICKSON, U.S.M.J.